

## REMARKS

Applicants thank Examiner Tommy D. Lee for having allowed claims 11 through 15, and 17 through 28 — and also for having pointed out the typographical error in claim 16. The Applicants also thank the Examiner for having indicated that that claim, and also claims 3, 6, 7, 32 and 33 would be allowable if suitably amended.

Applicants have amended claim 16, and also claims 3, 6 and 7. In view of the traverse explained below as to claim 29, however, Applicants respectfully wish to defer amendment of claims 32 and 33.

The Applicants have also canceled claim 1, and amended several other claims for clarity and accuracy — in particular claims 2 through 6, 9 through 11, 13 through 17, and 25:

- claim 2 has been amended simply to depend it from allowed claim 11;
- claims 3, 6 and 7 have been amended at the Examiner's invitation as mentioned above;
- claims 4, 9 and 10 have amended to depend from indicated-allowable claim 3;
- claim 5 has been amended for the reason explained below in connection with their rejection under Section 102; and
- the remaining claims have been amended for clarity or accuracy.

Generally the word "particular" has been inserted in all the claims before "colorimetric levels". This change simply provides an exclusion for the zero and 100% colorimetric lev-

els. As aptly noted by the Examiner, these do not have plural superpixels.

#### Section 112 rejections

In the Official Action it is said that original claim 16 is wrong in its dependency. Applicants agree, and apologize for this error — which has now been corrected.

#### Section 102 rejection

In the Official Action it is further said that claims 1, 2, 4, 5, 8 through 10, and 29 through 31 are anticipated by Tanaka or Kanematsu — or both. Applicants have acquiesced in these rejections as to all but claim 5, and claims 29 through 31, which are discussed below.

As to CLAIM 5, it is said in the Official Action (page 6, first full paragraph) that Kanematsu's teachings include (emphasis added) —

"using at least one least-significant bit that: results from the rendering step in a colorant dimension, but is substantially decorrelated from the colorimetric levels found by the rendering step (dot matrix pattern selected corresponding to quantized data, based on 4-bit random number value (column 5, line 60 — column 6, lines 1-7)). Because number value is random, there is no correlation between it and the colorimetric level."

Claim 5 does in fact recite a dummy dimension involving just such a least-significant bit.

Applicants traverse because Kanematsu's cited passage is not seen to teach deriving the dummy bit from the rendering

step, in a colorant dimension. Rather, the cited passage describes loading of the pixel value into a buffer but not then using it in generating the dummy bit.

More specifically, Kanematsu's random number value is divided by "the number of patterns of quantized data of an identical signal level". Kanematsu expressly says that the number of patterns "is eight" (line 65) — and this must presumably be true for all pixels in his example, irrespective of colorimetric value or of the rendition process.

The Applicants respectfully ask the Examiner to briefly review the disclosure basis of their claim-5 recitation, which runs in their specification only from page 25, line 16, through page 27 line 2. As there set forth in an example (emphasis in original): "the proposition is to use part of the ED error itself as the random bits."

The Applicants respectfully submit that Kanematsu does nothing of the kind, and also nothing that answers to the claim-5 recitation. While it is true that in Kanematsu there is no correlation between the colorimetry and the decorrelation, the reason for this is the absence of causal derivation, as explained just above.

Claim 5 has been amended to place it in independent form. It is believed to be in condition for allowance.

As to CLAIM 29, it is said in the Official Action (page 7, third line) that Kanematsu — at column 7 lines 1 through 9 — teaches "means for applying the randomized value, in common for all color planes, to select . . . a respective superpixel". Applicant's undersigned representative is unable to find in the cited passage such teaching as to commonality between

color planes. Applicants therefore respectfully traverse, and request clarification.

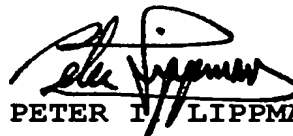
Section 103 rejections

It is additionally said in the Official Action that claim 10 is obvious over Tanaka and Kanematsu combined. Claim 10 has also been treated under Section 102; and as mentioned above the Applicants have amended the claim to depend from a claim indicated allowable.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's favorable reconsideration and allowance of all the claims now standing in this case. It is respectfully requested that, should there appear any further obstacle to allowance of the claims herein, the Examiner telephone the undersigned attorney to try to resolve the obstacle.

Respectfully submitted,



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